

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

ALBIN MELI, CHARLIE MELI, AND
JEREMIE MELI,
Plaintiffs,

v.

CITY OF BURLINGTON, VERMONT,
BRANDON DEL POZO,
JASON BELLAVANCE, AND
CORY CAMPBELL

Defendants.

Civil Action No. 2:19–CV–71

MABIOR JOK,
Plaintiff,

v.

CITY OF BURLINGTON, VERMONT,
BRANDON DEL POZO,
JASON BELLAVANCE, AND
JOSEPH CORROW

Defendants.

Civil Action No. 2:19–CV–70

**DEFENDANTS' MOTION TO STAY DISCOVERY PENDING RESOLUTION OF ALL
CURRENT DISCOVERY MOTIONS BY THE COURT**

NOW COME Defendants, by and through their attorneys, Lynn, Lynn, Blackman, & Manitsky P.C., and hereby move that discovery in this matter be stayed until the Court resolves the pending discovery motions. As noted in Defendants' simultaneously filed Motion for a Protective Order and Opposition to Plaintiffs' Motion for Additional Discovery, Defendants are rapidly incurring unreasonable discovery expenses reviewing documents requested by Plaintiffs. The Defendants require clarity from the Court regarding the scope of discovery in this matter, particularly as it relates to ESI, before it undergoes any additional review of documents. The Defendants need to know the search terms it will be obligated to use in running searches, the date ranges, and the custodians. As noted in *Brown v. Barnes and Noble, Inc.*, it is "imperative" that the Defendants know the overall scope of discovery in this case so as avoid wasting review time and redoing searches. 2019 WL 7168146, at *4 (S.D.N.Y. Dec. 23, 2019).

Moreover, Defendants would like the ENE session to be productive, but in order for that to happen, Defendants will need to have completed a fair amount of its production in these cases. Given the lack of clarity and disagreement between the parties on the scope of discovery in these matters, a stay of the ENE deadlines (as well as likely a move of those very same deadlines) is warranted.

Finally, a stay is necessary because there are a number of upcoming discovery deadlines that will need to be changed, and the only way Defendants will be able to provide new proposed deadlines is if the Defendants know the overall scope of discovery in this matter.

WHEREFORE, Defendants respectfully request that all discovery in the above-captioned matters be stayed pending a resolution from the Court on all currently pending discovery motions.

DATED at Burlington, Vermont, this 21st day of January, 2020.

By: /s/ Pietro J. Lynn
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